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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**REORGANIZED DEBTORS' REPORT
ON RESPONSES TO FOURTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (SECURITIES
ACQUIRED OUTSIDE SUBJECT
PERIOD) AND REQUEST FOR ORDER
BY DEFAULT**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

[Re: Dkt. No. 10662]

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**Resolving Objections Set for Hearing
June 30, 2021 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Fourth Securities Claims Omnibus*
9 *Objection (Securities Acquired Outside Subject Period)* [Docket No. 10662] (the “**Fourth Securities**
10 **Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE FOURTH SECURITIES CLAIMS OMNIBUS OBJECTION**

12 The Fourth Securities Claims Omnibus Objection seeks to disallow and expunge the proofs of
13 claim that were filed by PG&E security holders who do not purport to have purchased or otherwise
14 acquired PG&E securities during the period April 29, 2015 through November 15, 2018 and who did
15 not file a claim prior to the original bar date of October 21, 2019. These claims are listed in Exhibit 1 to
16 the Fourth Securities Claims Omnibus Objection.

17 **NOTICE AND SERVICE**

18 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Fourth Securities*
19 *Claims Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 10664] (the
20 “**Notice of Hearing**”). The Fourth Securities Claims Omnibus Objection was also supported by the
21 *Declaration of Edward J. Radetich, Jr. in Support of Reorganized Debtors’ Fourth Securities Claims*
22 *Omnibus Objection (Securities Acquired Outside Subject Period)* [Docket No. 10663] (the
23 “**Declaration**”). The Fourth Securities Claims Omnibus Objection, the Notice of Hearing, and the
24 Declaration were served as described in the *Certificate of Service* of Victor Wong, filed on May 24, 2021
25 [Docket No. 10709] (the “**Certificate of Service**”). As further described in the Certificate of Service,
26 on May 24, 2021, each holder of a claim listed on Exhibit 1 to the Fourth Securities Claims Omnibus
27 Objection received a notice including the claim number, debtor, claim amount and priority, and the basis
28 for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

1 The deadline to file responses or oppositions to the Fourth Securities Claims Omnibus Objection
2 has passed. The Reorganized Debtors have not received any formal or informal responses.

3 **DECLARATION OF NO OPPOSITION RECEIVED**

4 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

5 1. I am a partner with the law firm of Weil, Gotshal & Manges LLP (“**Weil**”), counsel for
6 the Reorganized Debtors.

7 2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined
8 that no responses have been filed with respect to the Fourth Securities Claims Omnibus Objection.

9 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
10 expunging the proofs of claim listed in the column headed “Claims to be Disallowed/Expunged” in
11 **Exhibit A** to this Request, which listed claims identical to those in Exhibit 1 to the Fourth Securities
12 Claims Omnibus Objection.

13 Executed on June 23, 2021 in New York, NY.

14
15 **WEIL, GOTSHAL & MANGES LLP**

16 **KELLER BENVENUTTI KIM LLP**

17 By: /s/ Richard W. Slack

18
19 Richard W. Slack

20 *Attorneys for Debtors and Reorganized Debtors*
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